

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE
(212) 482-1303 FAX
WWW.TALKINLAW.COM
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE
5100 DORSEY HALL DRIVE
SUITE 100
ELLCOTT CITY, MD 21042
410-964-0300

MEMO ENDORSED

NEW JERSEY OFFICE.
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311
201-342-6665

June 14, 2021

6/15/21

Honorable Colleen McMahon
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Bail modifications as requested
herein granted.

Colleen McMahon

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully makes two bail modification applications. On Wednesday, June 16, 2021, Cahill requests permission to travel to his house in Long Beach, New York, from 9:00 am to 7:00 pm so that he can complete the opening and preparation of his home for the summer season. The exact address of the home is known to Pretrial Services ("PTS") and the government. Additionally, from June 19, 2021, Cahill respectfully requests permission to attend a family gathering from 12:00 – 6:00 pm for Father's Day at a location near his home that is also known by PTS and the government. PTS, by United States Pretrial Service Officer Leo Barrios, consents to these applications and the government, by Assistant United States Attorney Jason Swergold, agrees with PTS' position on these applications.

Thank you for Your Honor's consideration of these requests.

Very truly yours,

Sanford Talkin

Sanford Talkin

cc: AUSA Jun Xiang (by ECF)
AUSA Danielle Sassoon (by ECF)
SAUSA Laura de Oliveira (by ECF)
USPTO Leo Barrios (by email)

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